

UNITED STATES DISTRICT COURT
DISTRICT OF MAINE

Raishawn Key,
Plaintiff

v.

City of Augusta,
Roberta Fogg,
William Bridgeo,
Sue Gosselin,
John Does ## 1-4,
Defendants.

CASE NO. 1:17-cv-00007-JDL

PLAINTIFF'S RESPONSES TO DEFENDANT'S FIRST DISCOVERY REQUESTS

RESPONSES TO REQUESTS FOR PRODUCTION

1. Plaintiff is including all documents referenced in the Complaint. Please see attached.
2. Plaintiff is including four pieces of written correspondence (the entirety of all correspondence). Please see attached.
3. Plaintiff is including one piece of correspondence that comprises the entirety of this request. Please see attached.
4. The plaintiff has not produced any such materials and is unable to respond to this request.
5. By virtue of the Plaintiff's incarceration, he is at this time, unable to comply with the request. Plaintiff does believe that witnesses are to be had and statements able to be given, yet plaintiff is unable to secure them because of his confinement status.
6. Plaintiff is including all such documents in his possession that reflects such address.
7. By virtue of the plaintiff's incarceration, he is unable to produce such a request as the State Department of Corrections prevents prisoners from having access to such materials.
8. There are no such documents available. Plaintiff will respond to this matter in item #12 of INTERROGATORIES.
9. Plaintiff cannot produce any such documents at this time without further discovery.
10. Plaintiff cannot produce any such documents at this time without further discovery.
11. Plaintiff is not in possession of any such documentation.
12. Plaintiff is including all documentation relating to this request. See attached.
13. At this time, Plaintiff has included all documents—relevant to these discovery requests.

RESPONSES TO INTERROGATORIES

1. Plaintiff participated in a voter registration drive at the Maine State Prison on September 28, 2016 having completed all the documents listed in item #13 of the Complaint. The Office of the Maine Secretary of State was there and representatives of that office collected all voter registration materials. Freemont Anderson, a notary staff member of the Maine State Prison notarized my documents. The Google Search performed was done approximately in the week of November 10th, 2016. To the plaintiff's knowledge, there are no additional details or documents, or information that the

plaintiff has that are not listed in the Complaint relevant to what is being asked in item #1.

2. Plaintiff resided at 3 Noyce Ct. Apt. #1 Augusta, ME. from May 17, 2013 until June 18, 2013.
3. A woman named Carol Gordon was the renter of the apartment but I do not know her whereabouts at this time.
4. LaToya Pugh, the mother of my children knew of my address and her contact information is 221 E. 122 Street, NY,NY 10035. Her phone number is 917-285-5557.
5. Freemont Anderson, Rachel Talbot-Ross, James Wilbur, Emmanuel Reynolds, Caseworker Guckin, Foster Bates, and Daniel Fortune are all people who were present at the voter registration drive. They will all say essentially the same thing and that is that plaintiff was present, desiring to register to vote, listening to the presentations of the various speakers, and when the time came, plaintiff filled out all the necessary paperwork and submitted it to the Secretary of State for further processing.
6. The address was looked up on or about the week of November 10,2016. The address was looked up by Freemont Anderson in his office at the Maine State Prison. The address was verified and was witnessed by both the plaintiff and Mr. Anderson.
7. Plaintiff believes that given the time delays, refusal of city officials to respond to correspondence initiated by the plaintiff, and an outright denial of my application materials without further action all lent to prejudicial actions by government employees. Plaintiff will require responses to his discovery requests before he is able to further and more fully respond to this question.
8. Plaintiff is of African-American descent, and is a convicted felon. Plaintiff does not at this time, know of any additional individuals.
9. Plaintiff believes that because of his status as a convicted felon and African-American, he was discriminated against in his efforts to vote. Further discovery material will be necessary for plaintiff to respond further.
10. Plaintiff believes that it is more likely than not that his voter registration application materials were handled and/or processed by more than one individual. As in any bureaucracy, there are multiple layers of supervision,management, and authority and plaintiff believes this to be true also for the City of Augusta.
11. Plaintiff will need additional discovery before he can respond to this inquiry. However, plaintiff believes on good faith that his denial was rooted in an inappropriate decision by government employees and will need access through the discovery process to determine what exactly happened.
12. Plaintiff wrote to the City Clerk's office on November 15, 2016 asking for instruction on how to file a complaint. No answer was forthcoming. Plaintiff asked his children's mother and brother to search on the City of Augusta's website for further instruction. There was no such instructions. Plaintiff does not have a copy of this letter.

RESPONSES FOR REQUESTS FOR ADMISSIONS

1. Plaintiff Admits
2. Plaintiff Admits
3. Plaintiff Denies
4. Plaintiff Denies

Date: _____

S/: _____